Subject: Re: Jackspon-witness information correspondence

Date: Thursday, October 3, 2019 at 4:56:59 PM Eastern Daylight Time

From: Gabriel Harvis
To: Stephanie L. Tanzi

CC: Keith M. Corbett, Loomba, Lalit K., Mastellone, Janine, Meisels, Peter, Holubis, Allison, Baree

Fett

Attachments: image001.png, image002.jpg

Hi Stephanie,

This does not comply with the Court's order or Rule 26(a)(1)(A)(i), as it does not provide the address or subjects of knowledge for the individuals, and it does not specify who Freeport contends has knowledge within the meaning of the Rules. We also have not received any of the insurance information, which we understood to also be due today.

In the interest of informal resolution, please provide compliant information by close of business tomorrow.

We are available if you would like to discuss.

Thank you, Gabe

Gabriel P. Harvis, Esq.

Partner / Co-Chair, Civil Rights Division

Elefterakis, Elefterakis & Panek 80 Pine Street, 38th Floor New York, New York 10005 (212) 532-1116 (212) 532-1176 Fax





"Elefterakis Law is NYC's power-house personal injury law firm"

From: "Stephanie L. Tanzi" <STanzi@HarrisBeach.com>

Date: Thursday, October 3, 2019 at 4:50 PM

To: Gabriel Harvis <gharvis@elefterakislaw.com>, Baree Fett
bfett@elefterakislaw.com>

Cc: "Keith M. Corbett" < KCorbett@HarrisBeach.com>, "Loomba, Lalit K."

<Lalit.Loomba@wilsonelser.com>, "Mastellone, Janine" <Janine.Mastellone@wilsonelser.com>,

"Meisels, Peter" < Peter. Meisels@wilsonelser.com >, "Holubis, Allison"

<Allison.Holubis@wilsonelser.com>

Subject: Jackspon-witness information correspondence

Gabe,

Please see the attached correspondence from our office. Thank you.

Stephanie L. Tanzi Attorney

HARRIS BEACH PLLC

ATTORNEYS AT LAW

333 Earle Ovington Blvd
Suite 901
Uniondale, NY 11553
516.880.8376 Direct
516.880.8483 Fax
516.880.8484 Main
Website | Bio | Add to Contacts

practice G R E E N

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